

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE

Donald R. Buckley,	:	Chapter 13
	:	
Debtor	:	Bankruptcy No: 20-13324-PMM

DEBTOR'S ANSWER TO THE MOTION

COMES NOW, the Debtor, Donald R. Buckley, by and through their attorney, Joseph T. Bambrick, Jr., who respectfully files this Answer to the Motion to the Trustee's motion to Dismiss, and in support thereof states as follows:

1. Debtor filed this Chapter 13 case on August 12, 2020, and has been making good efforts to comply with the terms on the confirmed plan.
2. Debtor's regular monthly plan payments is \$744.57. Due to financial hardship, Debtor has only been able to make approximately half of the required payment in recent months.
3. The shortfall is due to ongoing financial responsibility for his mother's medical expenses, as she is seriously ill and he is contributing to her care.
4. Despite these challenges, Debtor remains committed to completing his plan and is rescheduled to receive his discharge on September 2025, Dismissal at this point would result in undue hardship and waste nearly five years of effort and payments.

5. Debtor respectfully requests additional time to cure the arrears or alternatively to extend the plan term to accommodate the shortfall and preserve the case.

6. This request is made in good faith and not for the purpose of delay.

WHEREFORE, Debtor Respectfully request that this Honorable Court deny the Trustee's Motion to Dismiss, allow Debtor additional time to become current and grant any other relief deemed just and proper.

Respectfully submitted by,

Dated: May 22, 2025

/s/Joseph Bambrick

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